

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA**

Civil Action No. 22-2167 (CMC)

YORK COUNTY,	)
	)
Plaintiff,	)
	)
v.	)
	)
APPALOOSA MANAGEMENT LP,	)
DT SPORTS HOLDING, LLC,	)
TEPPER SPORTS HOLDING, INC,	)
AND THE CITY OF ROCK HILL	)
	)
Defendants.	)
	)

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**MOTION TO TRANSFER VENUE BY DEFENDANTS APPALOOSA MANAGEMENT, LP; DT SPORTS HOLDING, LLC; AND TEPPER SPORTS HOLDING, INC.**

Pursuant to 28 U.S.C. § 1412, Defendants Appaloosa Management L.P., DT Sports Holding, LLC, and Tepper Sports Holding, Inc. (collectively, the “Moving Defendants”), by their attorneys, hereby move for an order transferring this case to the United States District Court for the District of Delaware. Defendants’ Motion is based on the following grounds:

1. 28 U.S.C. § 1412 gives this Court authority to transfer the action to the District of Delaware because this action arises in or is “related to” a title 11 case pending there;
2. Venue is proper in the District of Delaware pursuant to 28 U.S.C. § 1409(a);
3. Transfer of venue to the District of Delaware is in the interest of justice because it would promote the economic and efficient administration of the bankruptcy estate;
4. Transferring this action to the District of Delaware is in the interest of justice because it would promote judicial efficiency; and

5. The District of Delaware is presumed to be the proper venue for this action in accordance with the “home court” presumption and deference to a debtor’s original choice of forum.

Pursuant to Local Rule 7.02, counsel for Moving Defendants affirm that prior to the filing of this motion they conferred with Plaintiff’s counsel in a good faith attempt to resolve the matter contained herein.

Defendants’ Motion is further based upon their Memorandum in Support that is being filed contemporaneously with this Motion, the pleadings that have been or will be filed in this action, exhibits and affidavits filed or to be filed, and upon applicable common and statutory law.

This the 14<sup>th</sup> day of July, 2022.

/s/ Christopher A. Ogiba

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